

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE CATTLE ANTITRUST LITIGATION	Civil No. 19-cv-1222 (JRT/HB)
<i>This document relates to:</i> ALL CASES	
KENNETH PETERSON, et al. Plaintiffs, v. JBS USA FOOD COMPANY HOLDINGS, TYSON FOODS, INC., CARGILL, INC., and NATIONAL BEEF PACKING COMPANY, Defendants.	Case No. 0:19-cv-1129 (JRT/HB)

**DECLARATION OF AMANDA F. LAWRENCE IN SUPPORT OF PLAINTIFFS’
MOTION TO NARROWLY LIFT THE DISCOVERY STAY TO REQUIRE
DEFENDANTS TO PRODUCE DOCUMENTS RECENTLY PROVIDED TO THE
DOJ**

I, Amanda F. Lawrence, declare as follows:

1. I am a Partner with Scott+Scott Attorneys at Law LLP, Interim Co-Lead Counsel for the *Cattle* Plaintiffs. I am admitted to practice in the District of Minnesota for purposes of this matter under this District’s *pro hac vice* procedure, and I am a member of the bar of the States of Connecticut and Massachusetts. I submit this Declaration in Support of Plaintiffs’ Motion to Narrowly Lift the Discovery Stay to Require Defendants to Produce Documents Recently Provided to the DOJ, filed herewith.

I am fully familiar with the facts set forth herein, and could and would testify to them if called upon to do so.

2. Attached hereto as Exhibit A is a true and accurate copy of a letter from U.S. Senators Tester, Jones, Booker, and Merkley to U.S. Attorney General Barr dated April 23, 2020.

3. Attached hereto as Exhibit B is a true and accurate copy of a letter from U.S. Senators Hawley and Baldwin to the Federal Trade Commission dated April 29, 2020.

4. Attached hereto as Exhibit C is a true and accurate copy of a letter from U.S. Representatives Lucas, Cole, Comer, Crawford, LaMalfa, Armstrong, Horn, Cheney, Scott, Smith, Gianforte, Barr, Aderholt, Fortenberry, Hern, Mullin, Marshall, Johnson, Allen, Guthrie, Davidson, Gottheimer, Stewart, Yoho, and Rose to U.S. Secretary of Agriculture Perdue dated May 1, 2020.

5. Attached hereto as Exhibit D is a true and accurate copy of a letter from Attorneys General Stenehjem (ND), Weiser (CO), Schmitt (MO), Fox (MT), Brnovich (AZ), Wasden (ID), Miller (IA), Ellison (MN), Peterson (NE), Ravensborg (SD), and Hill (WY) to U.S. Attorney General Barr dated May 5, 2020.

6. Attached hereto as Exhibit E is a true and accurate copy of a letter from Texas Dept. of Agriculture Commissioner Sid Miller to U.S. Attorney General Barr dated May 7, 2020.

7. Attached hereto as Exhibit F is a true and accurate copy of a letter from U.S. Senators Fischer, Crapo, Daines, Jones, Enzi, Rounds, Hoeven, Smith, Cramer,

Hyde-Smith, Barrasso, Risch, McSally, Sasse, Blackburn, Hawley, Ernst, Thune, and Baldwin to U.S. Attorney General Barr dated May 12, 2020.

8. Attached hereto as Exhibit G is a true and accurate copy of David McLaughlin, *DOJ Subpoenas Four Biggest Meatpackers in Antitrust Probe*, Bloomberg, June 4, 2020, <https://www.bloomberg.com/news/articles/2020-06-04/doj-subpoenas-four-biggest-meatpackers-in-antitrust-probe>.

9. Attached hereto as Exhibit H is a true and accurate copy of Brett Kendall and Jacob Bunge, *Chicken Industry Executives, Including Pilgrim's Pride CEO, Indicted on Price-Fixing Charges*, The Wall Street Journal, June 3, 2020, [wsj.com/articles/chicken-industry-executives-including-pilgrim-s-pride-ceo-indicted-for-price-fixing-11591202113](https://www.wsj.com/articles/chicken-industry-executives-including-pilgrim-s-pride-ceo-indicted-for-price-fixing-11591202113).

10. Attached hereto as Exhibit I is a true and accurate copy of Tyson Foods, Inc., Current Report (Form 8-K), June 10, 2020, <http://d18rn0p25nwr6d.cloudfront.net/CIK-0000100493/e5ca416b-b5f0-4211-8ed1-5005577eabf0.pdf>.

11. Attached hereto as Exhibit J is a true and accurate copy of Plaintiffs' First Set of Requests to all Defendants for the Production of Documents and Electronically Stored Information.

12. Attached hereto as Exhibit K is a true and accurate copy of Defendant Cargill, Incorporated's Response to Consumer Indirect Purchaser Plaintiffs' First Request for Production of Documents to All Defendants.

13. Attached hereto as Exhibit L is a true and accurate copy of *in re GSE Bonds Antitrust Litigation*, Civil Case Management Plan, Case No. 1:19-cv-01704-JSR, Docket No. 169 (S.D.N.Y. May 14, 2019).

14. Attached hereto as Exhibit M is a true and accurate copy of *in re: Lithium Ion Batteries Antitrust Litigation*, Order re: Production of Information Produced to Grand Jury, Case No. 13-md-02420, Docket No. 200, (N.D. Cal. May 21, 2013).

15. Attached hereto as Exhibit N is a true and accurate copy of *In re Diisocyanates Antitrust Litig.*, Order, No. 2:18-mc-01001, ECF No. 149 (W.D. Pa. Jan. 15, 2019).

16. Attached hereto as Exhibit O is a true and accurate copy of a letter from U.S. Senator Grassley to U.S. Attorney General Barr and U.S. Secretary of Agriculture Purdue dated March 31, 2020.

17. Attached hereto as Exhibit P is a true and accurate copy of *in re High-Tech Employee Antitrust Litig.*, Minute Order and Case Management Order, No. 11-cv-2509-LHK, Docket No. 88 (N.D. Cal. Oct. 26, 2011) (attached as Ex. P).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 24, 2020, in Colchester, Connecticut.

/s/ Amanda F. Lawrence
Amanda F. Lawrence